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9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 FACEBOOK, INC.,

14 Plaintiff,

15 v.

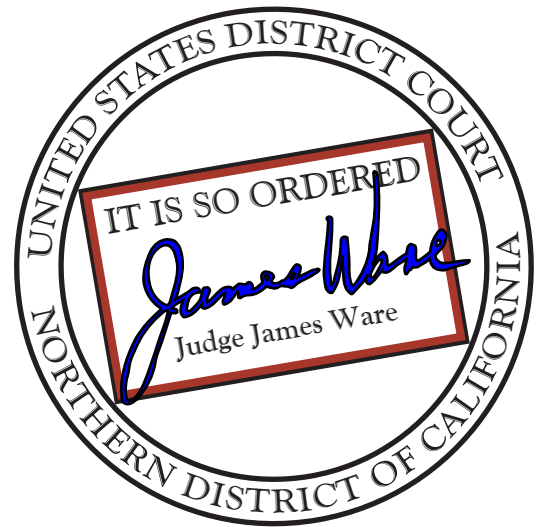
16 POWER VENTURES, INC. a Cayman Island
17 Corporation; STEVE VACHANI, an
individual; DOE 1, d/b/a POWER.COM,
18 DOES 2-25, inclusive,

19 Defendants.

Case No. 5:08-cv-05780 JW (HRL)

**ADMINISTRATIVE MOTION TO
FILE UNDER SEAL CERTAIN
PORTIONS OF THE DEPOSITION
TESTIMONY OF STEVE VACHANI
IN SUPPORT OF THE PARTIES'
JOINT STATEMENT PER JULY 14,
2011 COURT ORDER ON
DISCOVERY DISPUTE JOINT
REPORT #1 (DKT. NO. 113)**

Judge: Hon. James Ware
Courtroom: 8, 4th Floor



Pursuant to Local Rules 7-11 and 79-5(d), Plaintiff Facebook, Inc. (“Facebook”) submits this Administrative Motion to file under seal: 1) portions of the transcript of the July 20, 2011 deposition of Defendant Steve Vachani attached as **Exhibit 3** the Declaration of Morvarid Metanat In Support of the Parties’ Joint Statement per the Court’s July 14, 2011 Court Order on Discovery Dispute Joint Report #1 (Dkt. No. 113); and 2) portions of the Parties Joint Statement filed per the Court’s July 14, 2011 Court Order on Discovery Dispute Joint Report #1, that reference the July 20, 2011 deposition transcript of Steve Vachani.

Defendants Power Ventures and Steve Vachani have designated the entirety of the Steve Vachani deposition transcript as “Highly Confidential-Attorneys’ Eyes Only” pursuant to the Parties’ February 4, 2011 Protective Order (Dkt. No. 95). Pursuant to Local Rule 79-5(d), Facebook is lodging with the Clerk a copy of the under seal documents and filing a redacted version of the Parties’ Joint Statement filed per the Court’s July 14, 2011 Court Order on Discovery Dispute Joint Report #1 so that public access to non-confidential materials will be provided.

Dated: July 29, 2011

ORRICK, HERRINGTON & SUTCLIFFE LLP

/s/ Morvarid Metanat
 MORVARID METANAT
 Attorneys for Plaintiff
 FACEBOOK, INC.